January 19, 2011

Office of Information and Regulatory Affairs
Attention: Education Desk Officer
Office of Management and Budget
725 17th Street, NW, Room 10222
New Executive Office Building
Washington, DC 20503
oira_submission@omb.eop.gov and *ICDocketMgr@ed.gov*

Re: High School Longitudinal Study of 2009 (HSLS:09) First Follow-up Field Test 2011
OMB Control Number: 1850–0852

Dear Education Desk Officer,

On behalf of the nearly 100,000 bipartisan members and donors of the American Association of University Women (AAUW), I am pleased to share AAUW's comments on the Department of Education's High School Longitudinal Study of 2009 (HSLS:09) First Follow-up Field Test 2011. Since its founding in 1881, AAUW has been committed to making the dream of a free public education available to all students. AAUW's 2009-2011 Public Policy Program affirms our commitment to "a strong system of public education that promotes gender fairness, equity, and diversity… and advocates increased support for, and access to, higher education for women and other disadvantaged populations (and) increased access to higher education."[1]

The field test will follow 20,000 9th graders through their secondary and postsecondary years, with a focus on understanding their trajectories from the beginning of high school into college and the workforce. The field test is meant to provide data on 1) how students navigate the transition between high school and the postsecondary world; 2) what courses, majors, first job, and careers students decide to pursue; and 3) when, why, and how the students make those decisions, especially in regards to science, technology, engineering, and math courses, majors, and careers.[2]

With changes in the workforce over the last 130 years, higher education is becoming less of a luxury and more of a necessity. The U.S. is projected to add over 15 million jobs by 2018 that require at least some postsecondary education.[3] As the skill requirements of jobs continue to increase, so too should access to postsecondary education for all students. Additionally, AAUW strongly supports efforts to promote and strengthen STEM education, especially for girls and other underrepresented populations. These efforts will help increase America's competitiveness by reducing gender barriers that deter women from pursuing academic and career goals in these fields.

AAUW places particular importance on the three following areas of the field test:

- Cross-tabulation of data
- Collecting additional data
- Data accessibility

Cross-Tabulation of Data

AAUW suggests the field test data be cross-tabulated and disaggregated by all possible topics, including gender, race, ethnicity, socioeconomic status, English proficiency, mobility, disability, urban, rural, suburban districts, and other population characteristics wherever possible. This information would be very valuable, because under the current accountability system, schools do not have to report graduation rates by sex, schools are not held accountable for student performance by sex, and student performance and graduation rate data is not cross-tabulated (i.e., within each race, by sex) for either reporting or accountability purposes. The data from the field test would be a valuable resource to assess student graduation and performance levels, as well as other variables. Having the most detailed information possible will provide the best picture of these students' opportunities, challenges, and choices. School districts, educators, and policy-makers cannot create the right solutions if they do not have all the possible data. For example, knowing that the dropout rate varies dramatically between girls of color, with Native American girls dropping out twice as often as Asian girls, could have an impact on education policies.

Collecting Additional Data

AAUW suggests that the Department of Education consider including four additional sets of data in the field test. They are: 1) Why women and girls pursue, or don't pursue, STEM fields; 2) Students, especially women, entering non-traditional careers; 3) Students' stated goals; and 4) Factors affecting wages. The field test offers an invaluable opportunity to track a diverse group of students over a long period of time, and the Department should embrace this opportunity and collect as much data as feasible. This information would significantly benefit educators and policy-makers, and we urge the Department to consider tracking and collecting this additional data.

Why Women and Girls Pursue, or Don't Pursue, STEM Fields

A focus of the field test is *why* students pursue, or don't pursue, particular education and career paths, particularly STEM fields. Despite women earning 57 percent of undergraduate degrees in 2006-2007, women earned only 23 percent of all bachelor's degrees granted in engineering in 2006, and only 15 percent of female freshmen that year planned to major in a STEM-related field.[4] Overall, women comprise just 25 percent of the labor force in science, engineering, and technology fields, even though they are approximately half of the overall workforce.[5]

AAUW's 2010 report, *Why So Few? Women in Science, Technology, Engineering, and Mathematics,* found that environmental and social barriers – including stereotypes, gender bias and hostile academic climates – continue to block women's participation and progress in STEM.[6] Among first-year college students, women are much less likely than men to say that they intend to major in STEM. By graduation, men outnumber women in nearly every science and engineering field, and in some, such as physics, engineering, and computer science, the difference is dramatic, with women earning only 20 percent of bachelor's degrees.[7] Collecting data about why women and girls pursue or turn away from STEM education and careers will be extremely helpful for developing public policies and programs encouraging their engagement.

Students, Especially Women, Entering Non-Traditional Careers
The sad reality is that women and girls still face significant discrimination and gender stereotyping when they attempt to participate in vocational and technical education programs. Nationwide, a majority of female students are clustered into training programs for traditional "pink-collar" jobs and are therefore are less able to enter high wage careers.[8]

Since the data will track what careers the students pursue and enter, AAUW suggests the data collection methodology be configured to capture: 1) students in career and technical education (CTE) programs and 2) students entering "nontraditional" fields, such as women entering automotive repair and construction. Presently, women experience barriers to entering high-wage, high-skill jobs due to biased career counseling and recruiting. And, even after they enter nontraditional career and technical education programs, women may experience sexual harassment and differential treatment in the classroom.[9] Although several programs, such as the Workforce Investment Act (WIA), track participants, there is currently no means to track students enrolling in CTE programs and entering "nontraditional" careers. Capturing this data would help policy-makers and educators design curricula and programs to further encourage women and girls to pursue vocational and "nontraditional" careers.

Students' Stated Goals
AAUW suggests the Department of Education consider tracking students' stated career goals in the 9th grade and comparing those answers with the students' choices and accomplishments over the upcoming decade. Currently, the survey does not ask students what they actually want to become, i.e. a scientist, doctor, lawyer, teacher, etc., and it would be valuable to include this question and assess the resulting data, particularly the rate of the students' achieving these goals.

Factors Affecting Wages
AAUW recommends that the Department of Education produce the *Baccalaureate and Beyond Longitudinal Studies* (B&B) every two or three years and produce publicly available statistics in a timely fashion. This provides valuable data, which can allow for analysis of possible wage gap causes. According to the U.S. Census Bureau and Bureau of Labor statistics, women who work full time earn about 77 cents for every dollar men earn.[10] Wage discrimination persists despite women's increased educational attainment, greater level of experience in workforce, and decreased amount of time spent out of the workforce raising children.[11] Although the number of women attaining baccalaureate and advanced degrees now surpasses the number of men,[12] it has not translated into equal income. This pay gap between college educated men and women appears within the first year after college—even when women are working full-time in the same fields as men with the same major —and continues to widen during the first ten years in the workforce.[13] While the B&B data is very valuable, it is not published as frequently as AAUW would like.

The B&B studies provide rich nationally representative information on the working lives of U.S. college graduates. This data provides a wealth of information on the respondents, as well as a retrospective look at the undergraduate experience. It covers a variety of topics including: enrollment (field of study, institution type, attendance and enrollment patterns, financial aid),

employment (occupation, hours per week), plans and expectations for the future (employment after graduation, graduate school enrollment, family formation, civic participation, and undergraduate experiences (coursework, institutions, credits earned, grade point average), and basic demographic information (sex, age, race/ethnicity, marital status). For the college educated workforce, the B&B data provides a comprehensive view on the factors affecting wages. Having this dataset every two to three year will shed further light on reasons and factors behind the male/female wage gap.

Data Accessibility

Any data collected should be made publicly available in a consistent and timely manner, and be as transparent as possible considering students' privacy requirements. Additionally, the data should be presented in an accessible format, such as SAS, SPPS, or Microsoft Excel.

The field test presents a tremendous opportunity to track and learn more about students' decision-making, and AAUW urges the Department to make this data collection as comprehensive and accessible as possible. The results of this study will allow policy-makers and educators to understand these challenges and act accordingly to better serve the interests of students.

Thank you for the opportunity to submit comments on this important issue. I look forward to working with you on the issue of student achievement data. If you have any questions, please feel free to contact me at 202-785-7720, or Beth Scott, regulatory affairs manager, at 202-728-7617.

Sincerely,

Lisa M. Maatz
Director, Public Policy and Government Relations

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[1] AAUW. (June 2009). *2009-11 AAUW Public Policy Program.* Retrieved January 10, 2011, from http://www.aauw.org/advocacy/issue_advocacy/principles_priorities.cfm.

[2] U.S. Federal Register. (December 20, 2011). *Notice of Submission for OMB Review, Vol. 75, No. 243.* Retrieved January 10, 2011, from http://origin.www.gpo.gov/fdsys/pkg/FR-2010-12-20/pdf/2010-31799.pdf

[3] U.S. Department of Labor. Bureau of Labor Statistics. (December 11, 2009). *Economic News Release. Employment and total job openings by postsecondary education or training category, 2008-18*. Retrieved June 30, 2010, from http://www.bls.gov/news.release/ecopro.t09.htm.

[4] AAUW. (2010) *Why So Few? Women in Science, Technology, Engineering, and Mathematics.* Retrieved January 10, 2011 from http://www.aauw.org/learn/research/whysofew.cfm

[5] Inside Higher Ed. (January 9, 2007). *Progress Over the Long Term*. Retrieved June 29, 2009, from http://www.insidehighered.com/news/2007/01/09/science

[6] AAUW. (2010). *Why So Few? Women in Science, Technology, Engineering and Math*. Retrieved November 22, 2010, from http://www.aauw.org/learn/research/upload/whysofew.pdf.

[7] AAUW. (2010). *Why So Few? Women in Science, Technology, Engineering, and Mathematics.* Accessed November 15, 2010, from http://www.aauw.org/learn/research/upload/whysofew.pdf.

[8] National Women's Law Center. (2005). *Tools of the Trade: Using the Law to Address Sex Segregation in High School Career and Technical Education.* Retrieved December 7, 2007, from http://www.nwlc.org/pdf/NWLCToolsoftheTrade05.pdf.

[9] Annexstein, Leslie, "Opening the Door to Career and Technical Education Programs for Women and Girls." Equity Issues in Career and Technical Education, No. 390 (2003), pp. 5-16.